

**HANG & ASSOCIATES, PLLC**

ATTORNEYS AT LAW

136-20 38th Avenue, Suite 10G

Flushing, New York 11354

Ge Qu, Esq.

Tel: (718) 353-8588

Fax: (718) 353-6288

Email: rqu@hanglaw.com

**VIA ECF**

Hon. Vernon S. Broderick, U.S.M.J.

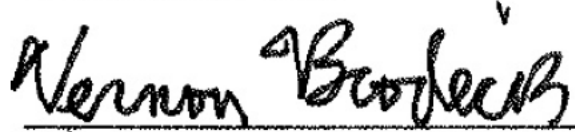
United States District Court

Southern District of New York

40 Foley Square

New York, NY 11354

**SO ORDERED:** 6/4/2024



**HON. VERNON S. BRODERICK  
UNITED STATES DISTRICT JUDGE**

The request for a stay is denied at this time. However, the 60-day extension request is granted. The parties are directed to file an Amended Case Management Plan and Scheduling Order by no later than June 11, 2024.  
**SO ORDERED.**

**Re: Owens v. Ghair Inc. et al**

Civil Docket No. 1:23-cv-10779-VSB

**Consent Joint Letter Motion to Stay Discovery**

Dear Judge Broderick:

This office represents Defendants Ghair Inc. and Long Human Hair Factory Inc. ("Defendants") in the above-referenced matter. Together with plaintiff, the parties jointly request this court to stay the ongoing fact-discovery pending the parties' participation in the Court's annexed mediation program; alternatively, the parties request a 60-day extension to complete fact discovery through August 18, 2024.

The current due date for the fact-discovery to conclude is June 19, 2024, per Case Management Plan and Scheduling Order dated February 22, 2024 (D.E. 16). This is the first time for the parties to request an enlargement of time to exchange discovery responses or to stay the discovery process pending the mediation process. The impetus for this request is that the parties both agreed to adjourn the mediation conference to June 21, 2024, and the preference of the parties to conserve resources in anticipation of the ADR process.

We appreciate the Court's time and attention to this matter.

Honorable Vernon S. Broderick, U.S.M.J.  
June 3, 2024  
Page 2

Respectfully submitted,  
Hang & Associates, PLLC  
By: s/ Ge Qu  
Ge Qu, Esq.  
*Attorneys for Defendants*